

# **EXHIBIT J**

**In re MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al., No. 09-50026**

**GUC Trust and New GM's Affirmative Designations of the Deposition Testimony of  
Daniel H. Golden and the Plaintiffs and Participating Unitholders' Objections Thereto**

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
14:14	14:17	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
15:11	15:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
15:19	15:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
15:25	16:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
17:10	17:14	
32:2	32:5	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
32:8	32:9	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
32:10	32:15	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
54:9	54:14	Irrelevant (FRE 401); calls for hearsay (FRE 802)
61:2	61:9	
61:10	61:13	
69:18	70:4	Objection to form vague and ambiguous (FRE 611(a))
70:7	70:8	
70:9	70:19	
72:23	73:14	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
73:15	73:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form compound (FRE 611(a))

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
73:22	74:10	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form compound (FRE 611(a))
74:11	74:14	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602); objection to form confusing (FRE 611(a))
74:16	74:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602); objection to form confusing (FRE 611(a))
74:19	74:22	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
74:23	75:6	Lack of foundation (FRE 602): irrelevant (FRE 401)
75:7	75:18	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
75:21	75:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
75:22	75:25	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
76:1	76:15	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
78:11	78:15	Objection to form compound (611(a)); lack of foundation, calls

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
		for expert opinion (FRE 602, 701, 702)
78:17	78:24	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702)
78:25	79:2	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
79:3	79:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
79:8	79:11	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
79:13	79:22	Objection to form compound (611(a)); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); calls for speculation (FRE 602)
83:14	83:18	Irrelevant (FRE 401); lack of personal knowledge (FRE 602)
83:19	83:22	Irrelevant (FRE 401); lack of personal knowledge (FRE 602)
83:23	83:25	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form vague and ambiguous (FRE 611(a))
84:2	84:3	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602); objection to form vague and ambiguous (FRE 611(a))
84:4	84:7	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
		personal knowledge (FRE 602)
84:8	84:13	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
84:15	84:17	Irrelevant (FRE 401); lack of foundation, calls for expert opinion (FRE 602, 701, 702); lack of personal knowledge (FRE 602)
91:2	91:16	Irrelevant (FRE 401); calls for hearsay (FRE 802); objection to form, compound, confusing (FRE 611(a))
91:17	91:19	Irrelevant (FRE 401); objection to form, vague, ambiguous, confusing (FRE 611(a))
91:22	91:23	Irrelevant (FRE 401); objection to form, vague, ambiguous, confusing (FRE 611(a))
107:1	107:14	Objection to form, asked and answered (FRE 611(a))
107:17	107:24	
110:1	110:2	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
110:5	110:7	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
111:20	112:1	Calls for hearsay (FRE 802)
112:2	112:7	Calls for hearsay (FRE 802)
130:13	130:15	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); objection to form, asked and answered (FRE 611(a))
130:19	130:20	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); objection to form, asked and answered (FRE 611(a))
130:21	130:23	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
133:14	133:17	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); objection to form confusing (FRE

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
		611(a))
133:19	133:19	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); objection to form confusing (FRE 611(a))
137:6	137:10	Lack of foundation, lack of personal knowledge (FRE 602)
137:13	137:13	Lack of foundation, lack of personal knowledge (FRE 602)
137:14	137:18	
141:18	142:3	Calls for hearsay (FRE 802)
146:6	146:15	
146:17	146:20	
151:11	151:15	Calls for hearsay (FRE 802)
154:11	154:14	
154:15	154:19	Lack of foundation, calls for speculation (FRE 602)
154:20	154:20	Objection to form, asked and answered (FRE 611(a))
155:4	155:6	Objection to form, asked and answered (FRE 611(a))
160:4	160:25	
161:1	161:5	Lack of foundation, calls for expert opinion (FRE 602, 701, 702)
161:6	161:8	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); calls for speculation (FRE 602)
161:11	161:21	Lack of foundation, calls for expert opinion (FRE 602, 701, 702); calls for speculation (FRE 602)
162:2	162:6	
163:2	163:5	Calls for hearsay (FRE 802)
163:6	163:10	Calls for hearsay (FRE 802)
163:11	163:17	Calls for hearsay (FRE 802)
163:18	163:24	
179:22	180:8	
180:9	180:23	
180:24	181:2	
181:3	181:6	
181:7	181:11	Calls for hearsay (FRE 802)

<b>Daniel H. Golden November 16, 2017</b>		
<b>GUC Trust and New GM's Affirmative Designations</b>		<b>Plaintiffs and Participating Unitholders' Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
181:12	181:14	Calls for hearsay (FRE 802)
181:15	182:2	Lack of foundation, lack of personal knowledge, calls for speculation (FRE 602); Incomplete (FRE 106)
185:6	185:11	
185:12	186:1	Lack of foundation, lack of personal knowledge, calls for speculation (FRE 602)
188:11	188:13	
188:14	188:18	
191:7	191:17	
191:18	191:23	Lack of foundation, calls for speculation, calls for expert opinion (FRE 602, 701, 702)
202:23	203:8	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion (FRE 602, 701, 702)
203:9	203:9	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion (FRE 602, 701, 702)
203:11	203:12	Lack of foundation, calls for speculation, lack of personal knowledge, calls for expert opinion (FRE 602, 701, 702)
207:8	207:11	Objection to form, vague and ambiguous (FRE 611(a))
207:14	207:20	Objection to form, vague and ambiguous (FRE 611(a))
207:21	208:13	Lack of foundation, calls for speculation, (FRE 602)
208:14	208:18	Objection to form, asked and answered (FRE 611(a))
208:20	208:21	Objection to form, asked and answered (FRE 611(a))
208:22	208:24	
209:14	209:17	Calls for hearsay (FRE 802); objection to form, vague and ambiguous (FRE 611(a))
210:6	210:6	Calls for hearsay (FRE 802);

Daniel H. Golden November 16, 2017		
GUC Trust and New GM's Affirmative Designations		Plaintiffs and Participating Unitholders' Objections
Designation Begin	Designation End	
		objection to form, vague and ambiguous (FRE 611(a))
210:7	210:9	Calls for hearsay (FRE 802)

**Plaintiffs and Participating Unitholders' Counter-Designations of the Deposition Testimony of Daniel H. Golden and the GUC Trust and New GM's Objections Thereto**

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
8:16	9:6	Not Testimony
11:15	11:21	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805)); Outside the Scope of FRCP 32(a)(6)
14:18	15:2	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805)); Outside the Scope of FRCP 32(a)(6)
15:8	15:9	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805)); Outside the Scope of FRCP 32(a)(6)
15:23	15:24	Not Testimony
18:14	19:7	Outside the Scope of FRCP 32(a)(6)
31:18	32:1	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
32:6	32:7	Not Testimony; Outside the Scope of FRCP 32(a)(6)
33:20	33:24	Relevance (FRE 401/402); Not Testimony; Lack of Foundation



Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
		(FRE 602); Hearsay (FRE 801/802/805)); Outside the Scope of FRCP 32(a)(6)
34:5	36:11	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805)); Outside the Scope of FRCP 32(a)(6)
50:13	50:16	Relevance (FRE 401/402); Hearsay (FRE 801/802/805); Not Testimony; Outside the Scope of FRCP 32(a)(6)
50:19	51:11	Relevance (FRE 401/402); Hearsay (FRE 801/802/805); Not Testimony; Outside the Scope of FRCP 32(a)(6)
59:12	59:17	Relevance (FRE 401/402); Not Testimony; Outside the Scope of FRCP 32(a)(6)
59:24	60:5	Relevance (FRE 401/402); Not Testimony; Outside the Scope of FRCP 32(a)(6)
60:8	60:13	Relevance (FRE 401/402); Not Testimony; Outside the Scope of FRCP 32(a)(6)
60:17	60:19	Relevance (FRE 401/402); Not Testimony; Outside the Scope of FRCP 32(a)(6)
62:19	63:6	Relevance (FRE 401/402); Hearsay (FRE 801/802/805); Outside the Scope of FRCP 32(a)(6)
70:5	70:6	Not Testimony
73:19	73:19	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
73:21	73:21	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
74:15	74:15	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
75:19	75:20	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
78:16	78:16	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
79:12	79:12	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
79:23	79:25	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
80:8	80:17	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
81:18	82:3	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805)); Outside the Scope of FRCP 32(a)(6)
84:1	84:1	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
91:20	91:21	Not Testimony; Outside the Scope of FRCP 32(a)(6)
107:25	108:14	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805; Outside the Scope of FRCP 32(a)(6)
108:24	109:15	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805; Outside the Scope of

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
		FRCP 32(a)(6)
110:3	110:4	Relevance (FRE 401/402); Lack of Foundation, (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
130:16	130:18	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805); Outside the Scope of FRCP 32(a)(6)
133:18	133:18	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805); Outside the Scope of FRCP 32(a)(6)
136:23	137:5	Not Testimony
137:11	137:11	Not Testimony
144:25	145:18	Relevance (FRE 401/402); Not Testimony
145:21	146:5	Relevance (FRE 401/402); Not Testimony; Outside the Scope of FRCP 32(a)(6)
146:16	146:16	Relevance (FRE 401/402); Not Testimony; Outside the Scope of FRCP 32(a)(6)
148:17	148:25	Relevance (FRE 401/402); Not Testimony; Outside the Scope of FRCP 32(a)(6)
149:3	149:9	Relevance (FRE 401/402); Not Testimony; Outside the Scope of FRCP 32(a)(6)
150:14	151:10	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805); Outside the Scope of FRCP 32(a)(6)

Daniel H. Golden November 16, 2017		
Plaintiffs and Participating Unitholders' Counter-Designations		GUC Trust and New GM Objections to Counter-Designations
Counter-Designation Begin	Counter-Designation End	
154:21	154:24	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805; Outside the Scope of FRCP 32(a)(6)
159:23	160:3	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805
161:9	161:10	Not Testimony
162:21	163:1	Outside the Scope of FRCP 32(a)(6)
182:3	182:3	Not Testimony
188:4	188:10	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805; Outside the Scope of FRCP 32(a)(6)
191:24	192:2	
199:18	200:10	Lack of Foundation (FRE 602); Not Testimony; Outside the Scope of FRCP 32(a)(6)
203:1	203:1	Not Testimony
203:10	203:10	Not Testimony
207:12	207:13	Not Testimony
208:19	208:19	Relevance (FRE 401/402); Not Testimony; Lack of Foundation (FRE 602); Hearsay (FRE 801/802/805; Outside the Scope of FRCP 32(a)(6)
209:18	210:5	Not Testimony